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Attorneys for Defendants  
 PFIZER INC., PHARMACIA & UPJOHN LLC  
 and GREENSTONE LTD.

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

CAROL SCHOENBERG,  
 Plaintiff,

vs.

WYETH PHARMACEUTICALS, INC.,  
 WYETH-AYERST PHARMACEUTICALS,  
 INC.; WYETH-AYERST INTERNATIONAL,  
 INC.; WYETH LABORATORIES, INC.;  
 WYETH PHARMACEUTICALS; WYETH,  
 INC.; PHARMACIA & UPJOHN, INC.;  
 PFIZER, INC.; BARR LABORATORIES, INC.;  
 GREENSTONE LTD.; JEANNIE ICHIMURA;  
 MICHELLE LUNA; and DOES 1 through 100,  
 inclusive,

Defendants.

CASE NO. C 05-00615 SBA

**JOINT STIPULATION AND  
 [PROPOSED] ORDER EXTENDING  
 DEADLINES TO FILE OPPOSITION  
 AND REPLY BRIEFS ON MOTION TO  
 REMAND**

Date: June 7, 2005  
 Time: 1:00 p.m.  
 Courtroom: 3 (3rd Floor)

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1 Plaintiff Carol Schoenberg ("Plaintiff") and Defendants Pfizer Inc., Pharmacia & Upjohn  
 2 LLC (incorrectly named as Pharmacia & Upjohn Inc.), and Greenstone Ltd. (hereinafter collectively  
 3 referred to as "Defendants"), by and through their respective attorneys, hereby stipulate and agree as  
 4 follows:

5 1. On December 22, 2004, Plaintiff filed a Complaint against Defendants in San  
 6 Francisco County Superior Court for fraudulent concealment, negligence, fraud, negligent  
 7 misrepresentation, breach of express warranty, and loss of consortium;

8 2. On February 10, 2005, Defendants removed the action from San Francisco County  
 9 Superior Court to the United States District Court, Northern District of California;

10 3. On April 21, 2005, Plaintiff filed a Notice of Motion and Motion to Remand Action  
 11 to State Court ("Motion to Remand");

12 4. Defendants' opposition to the Motion to Remand currently is due on May 17, 2005;

13 5. Defendants have requested, and Plaintiff has agreed, to a three day extension of time  
 14 for Defendants to respond to the Motion to Remand;

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6. Subject to the Court's approval, the time by which Defendants must file their Opposition Brief is extended three days, until **May 20, 2005**. The time by which Plaintiffs must file their Reply Brief also is extended three days, until **May 27, 2005**. The hearing date <sup>is</sup> ~~remains~~ <sup>14</sup> **June 7, 2005**.

Dated: May 11, 2005

KAYE SCHOLER LLP

By: Paul Gelb  
Paul Gelb  
Attorneys for Defendants  
PFIZER INC., PHARMACIA & UPJOHN LLC  
and GREENSTONE LTD.

Dated: May 11, 2005

PAUL & JANOFSKY

By: \_\_\_\_\_  
Michael B. Gurien  
Attorneys for Plaintiff  
CAROL SCHOENBERG

IT IS SO ORDERED.

Dated: May \_\_\_, 2005

\_\_\_\_\_  
HONORABLE SAUNDRA B. ARMSTRONG  
UNITED STATES DISTRICT COURT JUDGE

KAYE SCHOLER LLP

6. Subject to the Court's approval, the time by which Defendants must file their Opposition Brief is extended three days, until **May 20, 2005**. The time by which Plaintiffs must file their Reply Brief also is extended three days, until **May 27, 2005**. The hearing date <sup>is</sup> ~~remains~~ <sup>14</sup> **June 7, 2005**.

Dated: May 11, 2005

KAYE SCHOLER LLP

By: Paul Gelb  
Attorneys for Defendants  
PFIZER INC., PHARMACIA & UPJOHN LLC  
and GREENSTONE LTD.

Dated: May 11, 2005

PAUL & JANOFSKY

By: Michael B. Gurien  
Attorneys for Plaintiff  
CAROL SCHOENBERG

IT IS SO ORDERED.

Dated: May 13, 2005

/s/ Sandra Brown Armstrong  
HONORABLE SAUNDRA B. ARMSTRONG  
UNITED STATES DISTRICT COURT JUDGE

KAYE SCHOLER LLP